

To: wtc@nist.gov
Subject: Comments on Draft Reports on the Federal Building and Fire Safety
Investigation of the World Trade Center Disaster
From: Ganesh.Rao@us.ul.com

To: Stephen Cauffman
National Institute of Standards and Technology

Please see attached comments from Underwriters Laboratories Inc. on the draft reports on the "Federal Building and Fire Safety Investigation of the World Trade Center Disaster". Please contact the undersigned with any questions.

Best Regards,

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UL Comments-1 - NIST WTC Investigation Recommendations.doc



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COMMENTS ON THE FEDERAL BUILDING AND FIRE SAFETY INVESTIGATION
OF THE WORLD TRADE CENTER DISASTER

NAME: J. Thomas Chapin
AFFILIATION: Underwriters Laboratories Inc.
CONTACT INFORMATION: J.Thomas.Chapin@us.ul.com
REPORT NUMBER: NIST NCSTAR1 Draft
PAGE NUMBER: 204
PARAGRAPH/SENTENCE: Recommendation 4
COMMENT: Balanced Approach Underwriters Laboratories Inc. (UL) supports a balanced approach to fire protection that includes both passive and active systems to promote building safety. UL will continue to work with various organizations in preparing and supporting revisions to codes and standards that support the balanced approach.
REASON FOR COMMENT: Underwriters Laboratories Inc. (UL) is committed to a continual improvement in standards, systems, and processes for fire protection and public safety.
SUGGESTION FOR REVISION: None

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REPORT NUMBER: NIST NCSTAR1 Draft
PAGE NUMBER: 204
PARAGRAPH/SENTENCE: Recommendation 5
COMMENT: Areas of Future Research The effect of scale of test assemblies, end-restraint conditions and structural connections on the fire resistive performance of a test assembly requires more investigation. This research could be sponsored by public safety stakeholders and conducted by the North American Fire Test Labs. Standards Underwriters Laboratories Inc. (UL) will propose revisions to the UL 263 Standard Technical Panel (STP) regarding loading requirements, deflection limits and time-temperature curve. Likewise, UL intends to work with the fire protection industry and NIST to revise requirements in ASTM E119 based upon the knowledge gained by research cited above. UL will continue to support the efforts of the North American Fire Test Laboratories (NAFTL) to develop data to determine reproducibility of inter-laboratory test results. Fire Test Data UL routinely collects various types of data such as structural member deflection and temperature, unexposed surface deflection, and temperature and time to structural failure for inclusion in test reports. However, currently there is no requirement to publish this information. Publication of further data would require code and/or standards revisions. UL will work with all interested parties to determine the need for publication of additional information. REASON FOR COMMENT: Underwriters Laboratories Inc. (UL) is committed to continual improvement in standards, systems, and processes for fire protection and public safety. SUGGESTION FOR REVISION: None

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REPORT NUMBER: NIST NCSTAR1 Draft
PAGE NUMBER: 206
PARAGRAPH/SENTENCE: Recommendation 6
COMMENT: Durability Underwriters Laboratories Inc. (UL) has proposed a new standard, UL 2431, that addresses the durability of fire resistive materials and the retention of their fire resistive properties after exposure to simulated in-service conditions. It is anticipated that the new standard will be available for ballot by the first quarter of 2006. Inspection The on-site inspection of in-place fire resistive materials is a critical step toward obtaining the intended material performance in a fire. UL agrees with the need to develop a means to ensure that the in-place fire resistive materials perform as they would in the laboratory.
REASON FOR COMMENT: Underwriters Laboratories Inc. (UL) is committed to a continual improvement in standards, systems, and processes for fire protection and public safety.
SUGGESTION FOR REVISION: None

August 4, 2005

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CONTACT INFORMATION: J.Thomas.Chapin@us.ul.com
REPORT NUMBER: NISTNCSTAR Draft
PAGE NUMBER: 209
PARAGRAPH/SENTENCE: Recommendation 12
COMMENT: These recommendations make a general reference to enhancing the performance and providing for redundancy of active fire protection systems for certain structures. Underwriters Laboratories Inc. (UL) will continue working with the National Fire Protection Association (NFPA) committees responsible for NFPA 1, NFPA 12, NFPA 72, NFPA 90A and NFPA 101. Its important to consider whether these enhancements would substantially increase the costs associated with installing these systems and could have the potential to discourage their use. The diverse knowledge and expertise of the technical committees along with a consensus standard/code development process will provide the appropriate for a to fully consider these issues.
REASON FOR COMMENT: Underwriters Laboratories Inc. (UL) is committed to a continual improvement in standards, systems, and processes for fire protection and public safety.
SUGGESTION FOR REVISION: None

August 4, 2005

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REPORT NUMBER: NIST NCSTAR1 Draft
PAGE NUMBER: 213
PARAGRAPH/SENTENCE: Recommendation 19
COMMENT: Recommendation 19 contains a reference to making the emergency public address systems more robust. It is our opinion that unless the public address systems employ standby power and supervision of the wiring/equipment per NFPA 72, making the public address system "more robust" will not necessarily make the systems more reliable.
REASON FOR COMMENT: Underwriters Laboratories Inc. (UL) is committed to continual improvement in standards, systems, and processes for fire protection and public safety.
SUGGESTION FOR REVISION: None

August 4, 2005